

# Bennett, Giuliano, McDonnell & Ferrone, LLP

225 West 34<sup>th</sup> Street, Suite 402  
New York, New York 10122

**New Jersey Office:**

201 Littleton Road  
P.O. Box 513  
Morris Plains, NJ 07950  
Tel. (973) 387-0486  
Fax (973) 796-2884

Telephone: (646) 328-0120  
Telefax: (646) 328-0121  
[www.bgmplaw.com](http://www.bgmplaw.com)

**Florida Office:**

6615 W. Boynton Beach Blvd.  
Boynton Beach, FL 33437  
No. 351  
Tel. (561) 337-8816  
Fax (561) 337-4653

William R. Bennett, III Partner

[wbennett@bgmplaw.com](mailto:wbennett@bgmplaw.com)

July 26, 2006  
(Via fax 914-390-4152)

(Our File: D492)

\* \* \*

Hon. Colleen McMahon  
United States District Judge  
United States Courthouse  
300 Quarropas Street, Room 533  
White Plains, New York 10601-4150

Re: Vasquez, et al. v. Torres-Negron, et al.  
06-cv-00619 (CM)(MDF)

Dear Judge McMahon:

We represent the defendant Torres-Negron in the referenced matter and write to advise the Court that Plaintiff's papers in opposition to defendant's motion to transfer the matter to Puerto Rico, which is pending before your Honor, contains a serious misrepresentation.

The undersigned was recently advised by counsel in Puerto Rico that relevant witnesses associated with Sony BMG and EMI Latin are not located in New York as stated by plaintiff. Rather, the offices of Sony BMG and EMI Latin's for the Latin market are located in Miami. Accordingly, the only witness located in New York appears to Ms. Marti Cuevas, principal of defendant Campesino Entertainment Group.

Respectfully submitted,

William R. Bennett, III

cc: James Sheinbaum, Esq.  
Bornstein & Sheinbaum  
212.687.8710



7/26/06

The Court interprets this letter as a motion for reconsideration  
of the Court's 7/21 decision. The motion is denied. The case stays  
in this court.

P.. M..